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Counsel for Defendant RAMIREZ-GARCIA,

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	
)	No. CR 08-0172 DLJ
Plaintiff,)	
)	STIPULATION AND [PROPOSED]
v.)	ORDER CONTINUING STATUS
)	DATE AND EXCLUSION OF TIME
)	
MARCOS RAMIREZ-GARCIA,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties to this action, that the status date in this case, currently scheduled for Friday, June 6, 2008, before Honorable D. Lowell Jensen, may be continued to Friday, June 20, 2008, at 9:00 a.m. for status. Defense counsel needs additional time to review the immigration file and consult with an immigration attorney to determine whether to file any pretrial motions in this matter. Should the Court continue the matter to June 20, 2008, it will allow counsel to continue with its investigation and be in a better position to inform the Court as whether pretrial motions are likely to be filed. The parties stipulate that the time from June 6, 2008, to June 20, 2008, should be excluded in accordance with the provisions of the Speedy Trial Act, 18

1 U.S.C. §§ 3161(h)(8)(A) and (B)(iv) for continuity of counsel and adequate preparation of counsel.

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3 DATED: June 4, 2008

JOYCE LEAVITT
Assistant Federal Public Defender

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6 /S/

7 DATED: June 4, 2008

JAMES MANN
Assistant United States Attorney

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10 I hereby attest that I have on file all holographed signatures for any signatures indicated by a
11 conformed signature “/s/” within this e-filed document.

12
13 **ORDER**

14 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the status date in this case,
15 currently scheduled for Friday, June 6, 2008, before Honorable D. Lowell Jensen, may be continued
16 to Friday, June 20, 2008, at 9:00 a.m. for status.

17 IT IS FURTHER ORDERED that the time from June 6, 2008 to June 20, 2008, should be
18 excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(8)(A) and
19 (B)(iv) for adequate preparation of counsel. The Court finds that the ends of justice served by the
20 granting of the continuance outweigh the best interests of the public and the defendant in a speedy
21 and public trial and the failure to grant the requested continuance would unreasonably deny counsel
22 the reasonable time necessary for effective preparation, taking into account due diligence.
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1 SO ORDERED.

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5 DATED:

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7 HONORABLE D. LOWELL JENSEN
8 United States District Judge
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